

ORIGINAL

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FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

MAY 19 2006

at 3 o'clock and 52 min. P.M.  
SUE BEITIA, CLERK

Attorney for Defendant  
CHERYL ZEMBIK

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF HAWAII**

WILLIAM KOTIS,

Plaintiff,

vs.

STATE OF HAWAII DEPT. OF  
PUBLIC SAFETY, et. al.

Defendants.

CIVIL NO. 04-00167 SOM-KSC  
(Consolidated)

DEFENDANT CHERYL ZEMBIK'S  
COMPREHENSIVE WITNESS LIST

Trial Date: June 20, 2006

**DEFENDANT CHERYL ZEMBIK'S COMPREHENSIVE WITNESS LIST**

COME NOW DEFENDANT CHERYL ZEMBIK, by and through her  
attorneys, Mark J. Bennett, Attorney General of Hawaii, and Caron M. Inagaki and  
John M. Cregor, Jr., Deputy Attorneys General, hereby submits her comprehensive

witness list.

WITNESSES TO BE CALLED

A. LAY WITNESSES

1. Cinda Sandin  
Residency Section Supervisor of Halawa Correctional Facility  
c/o John M. Cregor, Esq.  
Dept. of the Attorney General  
425 Queen Street  
Honolulu, Hawaii 96813

State employee to testify on matters related to liability, including policies and procedures and her conversations with the Plaintiff.

2. Gary Kaplan  
Administrator with Halawa Correctional Facility  
c/o John M. Cregor, Esq.  
Dept. of the Attorney General  
425 Queen Street  
Honolulu, Hawaii 96813

State employee to testify as to authenticity of documents and to policies and procedures.

3. Cheryl Zembik  
Social Worker IV  
c/o John M. Cregor, Esq.  
Dept. of the Attorney General  
425 Queen Street  
Honolulu, Hawaii 96813

Defendant, State employee to testify on matters related to liability including policies and procedures and her conversations, if any, with Plaintiff.

4. Edward Rogish  
Adult Corrections Officer IV

c/o John M. Cregor, Esq.  
Dept. of the Attorney General  
425 Queen Street  
Honolulu, Hawaii 96813

State employee to testify on matters related to liability  
regarding Plaintiff's claims of a secret meeting.

5. Gary Saldana, M.D.  
c/o Department of Public Safety  
State of Hawaii  
919 Ala Moana Boulevard, 4th Floor  
Honolulu, Hawaii 96814

Dr. Saldana is expected to testify regarding Plaintiff's  
allegations and other related matters relating to his medical  
records and medical care.

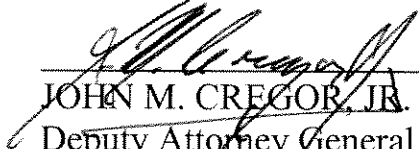
6. Kay Bauman, M.D.  
c/o Department of Public Safety  
State of Hawaii  
919 Ala Moana Boulevard, 4th Floor  
Honolulu, Hawaii 96814

Dr. Bauman is expected to testify regarding Plaintiff's  
allegations and other related matters relating to his medical  
records and medical care.

B. EXPERT WITNESSES

Defendant does not anticipate calling any expert witnesses.

DATED: Honolulu, Hawai'i, May 19, 2006.

  
JOHN M. CREGOR, JR.  
Deputy Attorney General  
Attorney for Defendant  
CHERYL ZEMBIK

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**CERTIFICATE OF SERVICE**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 19, 2006, a copy of the foregoing document was served on the following at her last known address via U.S. mail, postage prepaid as follows:

William Kotis #A0182281  
CCA/Tallahatchie Correctional Center  
295 US Highway 49 South  
P. O. Box 388  
Tutwiler, MS 38963

Plaintiff Pro Se

DATED: Honolulu, Hawaii, May 19, 2006.

  
JOHN M. CREGOR, JR.  
Deputy Attorney General

Attorney for Defendant  
CHERYL ZEMBIK